

**United States Bankruptcy Court
Eastern District of Pennsylvania**

TeNeka S. McDaniel,

Debtor.

Chapter 13
Case No. 22-11967-DJB

Motion to Modify Plan

AND NOW, Debtor TeNeka S. McDaniel, by and through her attorney, moves this Court to modify her confirmed Chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 13 on July 28, 2022.
2. The plan was confirmed on March 1, 2023.
3. The plan was modified on June 23, 2023 to add in an IRS claim filed after confirmation.
4. The Debtor is below-median as indicated on her Form 122C-1, and the commitment period is 3 years.
5. The Debtor was originally paying off her car through the confirmed plan, necessitating that the plan be 60 months long in order for the plan payments to be feasible.
6. The Debtor now wishes to surrender her car, and shorten her plan from 60 to 36 months.
7. The Debtor asks this Court to approve the modified plan.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: July 10, 2025

CIBIK LAW, P.C.
Counsel for Debtor

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